

BRIAN J. STRETCH (CABN 163973)
United States Attorney

BARBARA VALLIERE (DCBN 439353)
Chief, Criminal Division

MICHAEL MAFFEI (CABN 240978)
KAREN KREUZKAMP (CABN 246151)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7246
Fax: (415) 436-7207
Email: Michael.Maffei@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR-17-00040-RS
)	
Plaintiff,)	PROPOSED ORDER AND
)	STIPULATION TO CONTINUE AND EXCLUDE
v.)	TIME FROM THE SPEEDY TRIAL ACT
)	CALCULATION
MARC CHRISTOPHER BROCKHAUS,)	
)	
Defendant.)	

With the agreement of the parties, and with the consent of the defendant, the Court enters this order vacating the currently scheduled status conference on Tuesday, March 7, 2017, and orders the matter re-set on Tuesday, March 28, 2017 at 2:30 p.m. for a change of plea or trial setting, and confirms the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(b), from March 7, 2017 to March 28, 2017. The parties agree, and the Court finds and holds, as follows:

1. The parties have been in discussion about a resolution in this matter, and believe that a short continuance is warranted to finalize a plea agreement and to allow the defense to continue to review the discovery provided by the government. Therefore, the parties respectfully request that the Court vacate the currently scheduled status date of Tuesday, March 7, 2017, and re-set the matter for Tuesday, March 28, 2017, at 2:30 p.m. for a change of plea or trial setting.

3. The Court finds that, taking into the account the public interest in the prompt disposition of criminal cases, these grounds are good cause for excluding time. Given these circumstances, the Court finds that the ends of justice served by excluding the period from March 7, 2017 through and including March 28, 2017, outweigh the best interest of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A).

(1) the currently-scheduled status date of March 7, 2017 shall be vacated;

(2) the matter shall be re-set for March 28, 2017, at 2:30 p.m. for a change of plea or trial setting; and


IT IS SO STIPULATED.

BRIAN J. STRETCH
United States Attorney

/s/

MICHAEL MAFFEI
KAREN KREUZKAMP
Assistant United States Attorney

/s/
 JONATHAN MCDUGALL
 Counsel for the Defendant


HON. RICHARD SEEBORG
United States District Judge